

Response to:
SAIC Review Comments
Ecology Review Draft
Interim Action Completion Report
2011 Fenceline Area Soil Excavation, NBF
(Landau Associates, June 5, 2012)

Section 1.0, Page 1-1

The first paragraph states that interim action excavation activities took place in 2011 (as does the report title), and the third paragraph mentions activities that took place between July 2011 and the second quarter of 2012. It is unclear when specific events took place during this interval. Please provide in this report a detailed timeline of events for this interim action.

Response: A timeline of events has been added to Section 1.1. The date will be removed from the title of the final report.

Section 2.1, Page 2-1

Because the interim action levels (IALs) are distinguished by the presence or absence of PCBs in groundwater, please show the outline of the area containing groundwater with ≥ 0.03 $\mu\text{g/L}$ total PCBs (as shown in Boeing's IA Work Plan) on Figures 3 and 4.

Response: The approximate outline of the area containing groundwater with ≥ 0.03 $\mu\text{g/L}$ total PCBs has been added to Figures 3 and 4.

Section 3.0, Page 3-1, Fifth Paragraph; and Figures 2, 4, 6

The second sentence suggests that Figure 4 presents only confirmation sample data collected during excavation activities, but this figure presents data extending back to 1997. Please modify sentence. The IA Work Plan states that confirmation samples would be utilized from sampling results are far back as 2010. Please remove the 1997 sample results from Figure 4.

Response: The sample from 1997 (P17-UBF-55) has been removed from Figures 4 and 6.

The Interim Action Work Plan (June 2011) stated that confirmation samples also would be collected during excavation. It is unclear if any final confirmation samples were collected during excavation, with the possible exception of four samples collected in August 2011 at the southeastern end of the excavated area. For example, the cell excavated to 6.8 feet elevation in the south-central portion of this area has no confirmation samples shown on Figures 4 and 6.

Response: The four samples collected in August 2011 at the southeastern end of the excavated area were the only confirmation samples collected during excavation activities. Pre-excavation confirmation samples in all other areas provided sufficient coverage for confirmation sampling. As shown on Figure 3, there is a confirmation sample in the TSCA excavation area immediately adjacent to the cell excavated to 6.8 feet elevation.

In Figures 2 and 4, instead of "ND" for total PCB data, please present the reporting limits for these non-detected results. Add soil data for NGW501 to Figures 4 and 6.

Response: Figures 2, 4, and 6 have been revised per the above comment.

Section 3.1, Page 3-2; and Section 3.2, Pages 3-5 to 3-6; and Figure 6

These two sections include ranges of depths for each of the excavation areas or cells on Figure 6, and the text states that this figure presents depths for these areas. This figure actually presents only excavation bottom elevations; however, it would be useful on this figure to also include the ranges of depth for each area or cell.

Response: Ranges of depths that correspond with the elevations presented on Figure 6 have been added to the figure.

Section 3.1, Page 3-2, Fourth Paragraph; and Figure 6

The text refers to removal of OWS186 and the backfill for UBF-27. Please add these features to Figure 6.

Response: These features have been added to Figure 6.

Section 3.1, Page 3-3; and Section 3.2, Page 3-6

These two sections refer to soil removal “to elevations that generally met or exceeded planned excavation depths.” Please identify any specific areas where soil was not removed to planned excavation depths.

Response: Soil was removed to planned excavation depths in all areas. The text has been revised to reflect this.

Section 3.2, Page 3-6, First Full Paragraph

The text refers to six SB borings and it references the Work Plan Figure 4 (which should instead be Work Plan Figure 2). It would be more appropriate to reference Figure 3 of the current Completion Report, which includes these six borings. The text lists four of these borings as SB40, SB41, SB37, and SB39, but they are shown on these figures instead as LAI-SB borings.

Response: The text has been revised to reference Figure 3 of the Completion Report. It has also been revised to properly reference the “LAI-SB” borings.

The reference in the last sentence to Figure 5 should instead be Figure 4. Results for locations mentioned in this paragraph that are referenced to Table 1 do not seem to be presented in this table, except for CONFIRM-1.

Response: The text has been revised to reference Figure 4 instead of Figure 5. Results in Table 1 are for excavation confirmation samples only. Results for the other samples in the vicinity of the buried concrete pad (LAI-SB40, LAI-SB41, SB22, SB08, LAI-SB37, and LAI-SB39) have been previously presented in the PEL Soil and Groundwater Investigation Report. It was not the intent to include data for the other samples in Table 1. The text has been revised to help clarify this.

Section 3.5, Page 3-9, First Two Paragraphs

Again, a monthly timeline of events somewhere in the document would be useful. Did excavation activities only occur during 2011? Did the high-pressure air line get reinstalled in Spring 2012?

Response: A timeline of events has been added to the text in Section 1.1.

Section 3.5, Page 3-10; and Figure 6

The text refers to modifications at or near CB187A and MH187. Please add these features to Figure 6. The text also refers to the relocation or replacement of other catch basins on the east side of Building 3-326. Will a separate report include details of these modifications, or will the modifications be included in the final version of this Interim Action Completion Report?

Response: There were no modifications performed at CB187A or MH187. CB187A experienced some lateral shifting during excavation activities and following excavation the structure was reset to its original location. There are no modifications or changes to show on the Figure.

The modifications to the storm drain system that were performed during the air line reinstallation were completed independently from the interim action activities described in the report. Boeing will provide Ecology and SAIC with CAD files of the storm drain system modifications after the field survey has been completed.

Section 5.0, Page 5-1

In the first sentence, it appears that the goal of the Interim Action was to remove accessible PCB-contaminated soil at concentrations greater than 0.5 mg/kg, throughout the NBF fenceline area. This is distinct from the dual IALs developed in the Work Plan and described in Section 2.1 of this Completion Report. Does the text imply that excavation throughout the NBF fenceline area was accomplished so that all identified soil was removed to 0.5 mg/kg PCBs? The data presented in Figure 4 supports this outcome, but the limited information on Figure 3 (with additional sampling locations) is less certain.

Response: Section 2.1 states that a soil IAL of 0.5 mg/kg was used in the fenceline area soil excavations due to the detections of PCBs in groundwater throughout the fenceline excavation area. All known soil in the NBF fenceline excavation area with PCBs greater than 0.5 mg/kg was removed during the Fenceline Excavation.